

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DEUTSCHE BANK NATIONAL TRUST CO.)	CASE NO. 07-1007
AS TRUSTEE OF ARGENT MORTGAGE)	
Plaintiff)	JUDGE DAN A. POLSTER
)	
vs.)	
)	
)	
)	ANSWER OF DEFENDANT
)	<u>CITY OF CLEVELAND HEIGHTS</u>
DEMETRIUS JONES, et al.)	
aka, DEMETRIUS J. JONES)	
Defendants)	

Defendant City of Cleveland Heights (“City”), by and through counsel, for its answer to plaintiff’s complaint states as follows:

1. Defendant City denies all allegations contained in paragraphs 1- of plaintiff’s complaint for lack of knowledge or information sufficient to form a belief as to the truth thereof.
2. Defendant City of Cleveland Heights states that it has an interest in the property in question by virtue of the fact that defendant Demetrius Jones failed to file municipal income tax returns for the years 2005 and 2006. Because tax returns have not been filed, it is not possible calculate the amount of the City’s interests.

WHEREFORE, defendant City of Cleveland Heights respectfully requests the following:

- A. To join plaintiff in its demand for foreclosure and sale of the premises the subject of plaintiff's complaint;
- B. A determination of the validity and priority of all claims, and a declaration that defendant City of Cleveland Heights' interest is valid and its debt duly secured.
- C. For such other and further relief as the Court may deem just and proper.

/s/ Courtney L. Hall

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CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2007, a copy of the foregoing answer, cross-claim and counter-claim of defendant City of Cleveland Heights was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system

s/Courtney L. Lee

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